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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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In the Matter of)
Reallocation of Television Channels) ET Docket 97-157
60-69, the 746 - 806 MHz Band)

COMMENTS OF
ERICSSON INC.

Ericsson Inc.
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September 15, 1997

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Reallocation of Television Channels
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I. INTRODUCTION

In the Notice of Proposed Rulemaking in the above captioned docket,¹ the Federal Communications Commission ("Commission") proposes to address recommendations made by the Public Safety Wireless Advisory Committee² concerning allocation of a portion of UHF TV Channels 60-69 (746-806 MHz) spectrum to Public Safety use, in the context of the PSWAC conclusion³ of the need for 25 MHz of new

¹ In the Matter of Reallocation of Television Channels 60-69, the 746-806 MHz Band, ET Docket No. 97-157, FCC 97-245, released July 10, 1997 ("Notice").

² Final Report of the Public Safety Wireless Advisory Committee to the Federal Communications Commission and the National Telecommunications and Information Administration, September 11, 1996 ("PSWAC Final Report"), at pg. 21, para. 2.2.2.1.

³ PSWAC Final Report, at pg. 21, para. 2.2.1.

Public Safety allocations in the near term. The final resolution on the proposals made in the Notice will have a profound effect not only upon the public safety community, but most importantly upon the future safety of life and property for all Americans and our visitors. Careful resolution is therefore mandatory.

Ericsson is a recognized leader in the telecommunications industry with over 90,000 employees worldwide (over 8,500 employees in the United States) and with business partnerships in more than 100 countries, and more than \$20 Billion in net sales in 1996, is a major participant in the wireless communications marketplace. In particular, through its Private Radio Systems operation in Lynchburg, Virginia, Ericsson is a major supplier of public safety land mobile radio equipment and systems. Being a major supplier of wireless systems, and recognizing the central role played by effective and efficient wireless communications in allowing law enforcement to satisfy its obligation to protect the safety of life and property, Ericsson is pleased to submit these comments in response to the Notice.

II. NATIONAL PUBLIC SAFETY TELECOMMUNICATIONS COUNCIL

In May of 1997, a number of prominent public safety organizations, trade associations and governmental agencies, recognizing the need for public safety to speak with a unified voice, formed the National Public Safety Telecommunications Council ("NPSTC"). One of the principal objectives of NPSTC is to encourage and facilitate implementation of the findings and recommendations of PSWAC. One of the

NPSTC functions as set out in its charter is to develop and make recommendations to appropriate governmental bodies regarding public safety communications issues.

Pursuant to this charter directive, and in anticipation of this Notice, NPSTC formed a subcommittee to specifically address the issue of public safety use of the 746-806 MHz spectrum. This subcommittee welcomed the input and assistance of all manufacturers in formulating the NPSTC comments to this Notice. Ericsson was one of the manufacturers who assisted the subcommittee in formulating the NPSTC comments.

III. SECTION BY SECTION COMMENTS

As noted immediately above, Ericsson has participated in the 746-806 MHz subcommittee's formulation of the NPSTC comments to the Notice. Rather than tediously repeating the same comments on the proposals contained in the Notice, **Ericsson is pleased to state that it fully supports the NPSTC comments submitted in response to this Notice.** Ericsson believes the NPSTC comments adequately address the issues raised in the Notice, and we do not believe there are other issues that need to be raised at this time, in response to this Notice.

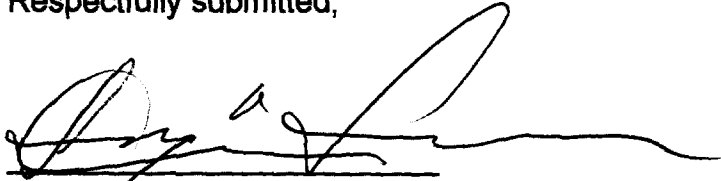
Ericsson does, however, feel it is appropriate to re-emphasize some of the observations made in the NPSTC comments. Everyone must remember PSWAC made many recommendations concerning the needs of public safety through the year 2010. Nobody should mistakenly think the proposals made in this Notice address **all** of the PSWAC recommendations. One example of these additional PSWAC

recommendations was the PSWAC finding that approximately 70 MHz of additional spectrum allocations, i.e. , beyond the 24 MHz allocation proposed in the Notice, were identified as necessary if public safety is to meet its obligation of protecting life and property in the year 2010. Another set of key PSWAC recommendations not resolved by the proposals in the Notice, concerns the problems associated with, and the need for, interoperability among public safety agencies at all governmental levels. Nobody should think that the interoperability problem will be solved simply by the allocation of additional spectrum, particularly spectrum in the 746-806 MHz band. Interoperability among radios that operate in different bands will remain a problem even after this new allocation for public safety is finalized.

VI. CONCLUSION

The proposals made in the Notice are an important **first** step towards realizing the implementation of the PSWAC recommendations. Ericsson, like NPSTC commends the Commission for this proposed action, and urges the Commission to immediately implement the proposal to reallocate channels 63-64, and 68-69 to the exclusive use of public safety. Furthermore, Ericsson encourages the Commission to take all steps necessary to facilitate the full use of this spectrum by public safety as discussed in the NPSTC comments, as soon as possible. Much more remains to be done beyond the proposed allocation of 24 MHz of spectrum to public safety if the full range of PSWAC recommendations is to be addressed.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Lars-Goran Larsson', written over a horizontal line.

Dr. Lars-Goran Larsson
Director, Standards and Regulations

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